

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JOYDEEP BOSE**

*Plaintiff,*

**vs.**

**LANE'S VALLEY FORGE  
AVIATION, INC., SANDRA JUBB and  
LANE RICHARD JUBB, JR.**

*Defendants.*

NO. 2:16-CV-03924-JHS

CIVIL ACTION

**MOTION OF KOLMAN ELY P.C. TO WITHDRAW AS COUNSEL**

Kolman Ely, P.C. ("Movant"), hereby moves this Honorable Court for leave to withdraw as counsel for the Plaintiff in the above-captioned matter and in support thereof avers as follows:

1. Movant currently represents the Plaintiff in the above-captioned case.
2. The Pennsylvania Rules of Professional Conduct are applicable and adopted in this Court.
3. Pursuant to Rule 1.16(b) of the Pennsylvania Rules of Professional Conduct, a lawyer may withdraw from representing a client if:
  - (1) withdrawal can be accomplished without material adverse effect on the interests of the client...
  - (4) the client insists upon taking action that the lawyer considers repugnant or with which the lawyer has a fundamental disagreement...
  - (5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
  - (6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client.
  - (7) other good cause for withdrawal exists.

4. Movant also owes a duty of strict confidentiality to Plaintiff consistent with Rule 1.6 of the Pennsylvania Rules of Professional Conduct.
5. While maintaining said confidentiality, Movant respectfully submits that it has good cause to withdraw as counsel for the Plaintiff consistent with Rule 1.16(b)(1), (4), (5), (6) and/or (7).
6. By way of the instant motion, Movant seeks leave of this Court to withdraw as counsel for the Plaintiff.
7. If granted, the undersigned will serve a copy of the Order upon the Plaintiff immediately.
8. Plaintiff has also been served with a copy of this motion by Certified Mail.
9. Movant respectfully suggests affording Plaintiff forty-five (“45”) days to obtain new counsel or decide whether he intends to proceed *pro se*.
10. There would be no prejudice to the Defendant if the motion were to be granted.
11. Movant respectfully submits that “good cause” exists to grant the instant motion.

**WHEREFORE**, Movant prays this Honorable Court grant the instant motion.

Respectfully submitted,

KOLMAN ELY, P.C.

/s/ Timothy M. Kolman  
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*Attorneys for Movant, Kolman Ely, P.C.*

Dated: April 29, 2019